

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ROKU INC.,

Plaintiff,

v.

ACCESS ADVANCE LLC, DOLBY
LABORATORIES, INC. (Delaware), DOLBY
LABORATORIES, INC. (California), DOLBY
INTERNATIONAL AB, DOLBY
LABORATORIES LICENSING
CORPORATION, DOLBY VIDEO
COMPRESSION, LLC f/k/a GE VIDEO
COMPRESSION, LLC, and SUN PATENT
TRUST,

Defendants.

Case No. 1:24-cv-13217-RGS

ORAL ARGUMENT REQUESTED

DEFENDANTS' MOTION TO DISMISS OR, IN THE ALTERNATIVE, TO STAY

Defendants Access Advance LLC, Dolby Laboratories, Inc. (Delaware), Dolby Laboratories, Inc. (California), Dolby International AB, Dolby Laboratories Licensing Corp., and Dolby Video Compression, and Sun Patent Trust (collectively, "Defendants"), pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(2), 28 U.S.C § 2201(a), and the doctrine of *forum non conveniens* hereby move the Court to dismiss the First Amended Complaint. In the alternative, Defendants request that this Court stay this case. In support of this Motion, the attention of the Court is respectfully directed to Memorandum of Law in Support of Defendants' Motion to Dismiss or, in the Alternative to Stay, and to any additional arguments to be properly presented in support of the requested relief in this motion.

WHEREFORE, Defendants respectfully request that the Court GRANT Defendants' Motion to Dismiss or, in the Alternative, to Stay.

REQUEST FOR ORAL ARGUMENT

Defendants respectfully request an oral argument on its Motion to Dismiss or, in the Alternative, to Stay.

Respectfully submitted,

Defendants Access Advance LLC, Dolby Laboratories, Inc. (Delaware), Dolby Laboratories, Inc. (California), Dolby International AB, Dolby Laboratories Licensing Corp., Dolby Video Compression, and Sun Patent Trust.

By their counsel,

By: /s/ Andrew T. O'Connor
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RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), counsel for defendants conferred with counsel for plaintiff to narrow the issues in this motion, who confirmed that plaintiff opposes this motion.

/s/ Andrew T. O'Connor
Andrew T. O'Connor

CERTIFICATE OF SERVICE

I hereby certify that, on March 20, 2025, I electronically filed the foregoing with the Clerk's Office using the Court's CM/ECF system, which will send notification of this filing (NEF) to all registered participants, and paper copies will be sent to those indicated as non-registered participants.

/s/ Andrew T. O'Connor
Andrew T. O'Connor